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United States Bankruptcy Court for the District of Delaware

In re: FTX Trading Ltd., et al., Debtors

Chapter 11

Case No. 22-11068 (JTD)

Response to Debtors' One Hundred Nineteenth (Non-Substantive) Omnibus Objection to

Certain No Liability Proofs of Claim (Customer Claims)

Claimant:

Name: Manik Jain Claim Number: 91340

FTX Account ID:

#### I. Introduction

I, Manik Jain, am submitting this Response to the Debtors' objection to my proof of claim (Claim No. 91340). I respectfully oppose the Debtors' request to disallow and expunge my claim and request that the Court allow my claim in the amount of \$12,176.9264 USD.

## II. Basis for My Claim

- Account Activity Overview from Account Creation Date to (and including) Nov 11, 2022
  - Deposits: Detailed records of these deposits are attached as Exhibit A
     (main\_deposits.csv downloaded from the FTX Customer Claims Portal). I
     deposited a total of 17.03988163 Ethereum (ETH) into my FTX trading account
     (Account ID The above figure is obtained by summing the entries in
     the Amount column of Exhibit A.
  - Trades: Detailed records of all trade are attached as Exhibit B (main\_trades.csv downloaded from the FTX Customer Claims Portal). I executed a series of sell orders totaling 17.039 ETH in the ETH/USD trading pair (sum of entries in Column Size). The total proceeds from these sales amounted to \$22,215.1422 USD (sum of entries in Column Total), minus fees of \$35.9039864 USD (sum of entries in Column Fee), resulting in net sales proceeds of \$22,179.23821 USD.
  - Withdrawals: Withdrawal records are attached as Exhibit C (main\_withdrawals.csv downloaded from the FTX Customer Claims Portal)
     I performed 5 successful withdrawals amounting to a total of 9999.811814 USDP

(sum of entries with status **Complete** in Column **Amount**) from my FTX account, incurring fees of 2.5 USDP (sum of entries in Column **fee**). The total amount withdrawn was **\$10,002.31181 USD** (given the 1:1 conversion rate of USD to USDP).

- Outstanding Balance Calculation
  - i. Net Proceeds from Trades: \$22,179.23821 USD
  - ii. Total Withdrawals: \$10,002,31181 USD
  - iii. Outstanding Balance Owed: \$22,179.23821 USD (from sale of 17.039 ETH) minus \$10,002.31181 USD (withdrawal) = \$12,176.9264 USD (net remaining in FTX Account)
- 2. Supporting Documentation
  - o Exhibit A: Deposit Records from FTX Customer Claims Portal
  - o Exhibit B: Trade History from FTX Customer Claims Portal
  - Exhibit C: Withdrawal Records from FTX Customer Claims Portal

These documents provide detailed evidence of all transactions related to my FTX account and substantiate the outstanding balance owed to me by the Debtors.

# III. Response to the Debtors' Objection

# 1. Validity of My Claim

The Debtors have objected to my claim on the basis of "No Liability," asserting that they have no record or basis for the claim. However, the attached documentation demonstrates that:

- I had an active trading account with FTX.
- o I deposited significant assets into the account (17.03988163 Ethereum (ETH)).
- I conducted trades resulting in net proceeds (sale of ETH holding and partial withdrawal)
- o There remains an outstanding balance owed to me that has not been withdrawn.

## 2. Prima Facie Validity

According to the Bankruptcy Code and relevant rules, a properly filed proof of claim with adequate supporting documentation constitutes prima facie evidence of the validity and amount of the claim. My claim includes detailed transaction records supporting the amount asserted.

## 3. Request for Relief

I respectfully request that the Court:

- o Overrule the Debtors' objection to my claim.
- o Allow my claim in the amount of \$12,176.9264 USD.
- o Grant any other relief the Court deems just and proper.

## IV. Conclusion

For the reasons stated above, my claim is valid and supported by comprehensive documentation. I urge the Court to consider the evidence provided and allow my claim in full.

Dated: 11/2/24
Respectfully submitted.

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Signature: Manik Jain

#### **Certificate of Service**

I hereby certify that on <u>11/2/24</u>, I served a copy of this Response upon the following parties via USPS first-class mail and electronic mail:

- 1. Office of the Clerk of the United States Bankruptcy Court for the District of Delaware
  - o 824 Market Street, 3rd Floor, Wilmington, Delaware 19801
    - i. Sent via USPS first-class mail
- 2. Sullivan & Cromwell LLP
  - o Attn: Christian P. Jensen (jensenc@sullcrom.com)
    - i. Sent via electronic mail
  - Attn: David M. Rosenthal (<u>rosenthald@sullcrom.com</u>)
    - i. Sent via electronic mail
  - 125 Broad Street, New York, New York 10004
    - i. Sent via USPS first-class mail
- 3. Landis Rath & Cobb LLP
  - o Attn: Adam G. Landis (landis@lrclaw.com)
    - i. Sent via electronic mail
  - o Attn: Kimberly A. Brown (<u>brown@lrclaw.com</u>)
    - i. Sent via electronic mail
  - o 919 Market Street, Suite 1800, Wilmington, Delaware 19801
    - i. Sent via USPS first-class mail

Signature: Manik Jain

## Attachments:

- Exhibit A: Deposit Records obtained from FTX Customer Claims Portal
- Exhibit B: Trade History obtained from FTX Customer Claims Portal
- Exhibit C: Withdrawal Records obtained from FTX Customer Claims Portal

# V. Correction of Original Proof of Claim

I acknowledge that my original Proof of Claim (Claim No. 91340) filed on **February 5, 2024** contained incorrect balance information. The error was unintentional and resulted from a miscalculation due to incomplete records at the time of filing.

In this Response, I have provided the corrected balances and detailed supporting documentation to accurately reflect the outstanding amount owed to me by the Debtors. I respectfully request that the Court accept this Response as an amendment to my original Proof of Claim to correct the inaccuracies.

Exhibit A - Deposits

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			Amount Status	s Additional info	Transaction ID
	2022-11-11T21:37:16.130073+00:00			- F	The second secon
	2022-11-11T21:33:46.131047+00:00				0xd8244f1952fb939d2c294664d6008a53b3542775f3d6602e2b708903d17a1db7
	2022-11-11T21:29:45.132409+00:00			rmed	0x388443ba08f93d46c5fe4d371ba143d04de744a8e84fd3e9a3aaa00e79aca1dc
	2022-11-11T21:20:45.133186+00:00			rmed	0x98b8baec3b5d10ae794979bd2dda4b9cf979530104144df3d184ff34620fa4ec
1327679	2022-11-11T21:15:16.129648+00:00	ETH	0.03988163 confin	rmed	0xefeb90ba8c57365fa23ed1fa0c5e77327dd2e5e49ebe564ad68783892ea493ac 0x84626b0b567170e1f78683c5f15084598ef4486ec5c5f147410f27ef16b5b990

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119/25007	Time	arren adam	Market	Side	Order Type	Size	Price	Total	Fee	Fee Currency	TWAP
and the second second second second	11/11/2022,	·	Contraction and the Contraction of the Contraction	sell	Limit	7	1333	9331	processor and the second secon	Service Control of the service of th	FALSE
118433154	Processing and the control of the co	Acres mercanismin	THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER.	sell	Limit	5	1488	7440		USD	FALSE
118432536	THE PERSON NAMED IN COLUMN TOWN THE PARTY OF	and the same of the same of the same of	The of a solution with the control of the same	sell	Limit	2.215	1487	3293.705			FALSE
118432515	*** * ** * * * * * * * * * * * * * * * *	and the same and a		sell	Limit	0.008	1490	11.92	grand and the second	CAPTONIC CONTRACTOR CO	FALSE
118432513	Contract to the contract of th	a contract the	State State State of Management and the same of the same	sell	Limit	0.02	1490	29.8	0.0596	USD	FALSE
	11/11/2022,		and the second of the commence	sell	Limit	1.257	1490	1872.93	The state of the s	and the second s	FALSE
118431790	THE RESIDENCE OF THE AMERICAN CONTRACT OF THE AMERICAN		TO A TOTAL CONTROL AND ADDRESS OF	sell	Limit	0.693	1399	969.507	0.969507		FALSE
118431788	the second contract of the con	A STATE OF THE STATE OF	decreased and and the company of the	sell	Limit	0.016	1399	22.384	· · · · · · · · · · · · · · · · · · ·		FALSE
118431786	- No. Committee of the	an san dan	Control of the Contro	sell	Limit	0.008	1399	11.192	0.011192		FALSE
118431784	According to the second contract the second	ere the second second	the time sensitive constraints and the constraints	seli	Limit	0.011	1399	15.389	0.015389	The state of the s	FALSE
118431780	THE RESIDENCE OF STREET	maria asserbe en	THE CONTROL OF THE CO	sell	Limit	0.06	1399	83.94	0.08394	and the second of the second o	FALSE
118431772	Control of the Contro	o ware were boy.	AMOUNT THE THE THE THE THE THE THE THE THE TH	sell	Limit	0.355	1399	496.645	0.496645		FALSE
118431755	The course property and the second second		The second responsible and the second	sell	Limit	0.008	1399.7	11.1976	0.0223952	Harmonia area a superior and a super	FALSE
118431753	errandon como esta los como aconos como como en como esta		· · · · · · · · · · · · · · · · · · ·	sell	Limit	0.01	1399.8	13,998	0.027996	Commence with the control of the con	FALSE
118431751		**** * *** **** ****	Annual Communication of the Co	sell	Limit	0.01	1399.8	13,998	0.027996	and the second section is a second section of the second	FALSE
118431749	commence of a contract of the	*	CONTRACTOR	sell	Limit	0.01	1399.8	13.998	0.027996	Colonia coperation and graph management of the colonial	FALSE
118431498	to the that the till the time of the commence of	1 9 100 734	and the second of the second o	sell	Limit	0.027	1419.6	38.3292	0.0383292	or a series are a regulation of the series o	FALSE
118431477			For Gallery and Andrewson and	seli	Limit	0.222	1419.7	315,1734	0.6303468	· · · · · · · · · · · · · · · · · · ·	FALSE
118431475	Self-Marie Committee - Character - Committee - Committ	A THE PERSON OF A	CONTRACTOR OF STREET,	sell	Limit	0.008	1423.2	11.3856	0.0227712	The second secon	FALSE
118431473			The same and treatment and the same	sell	Limit	0.007	1424.5	9.9715	0.019943	Will British the Committee of the Commit	FALSE
118431471	A CAMPAGA CONTRACTOR OF THE CO	e e e e e e e e e e e e e e e e e e e	control of the contro	sell	Limit	0.007	1424.5	9.9715	0.019943		FALSE
118431469	man and the second second second second	0.022.140	e recent decement and recent as a	sell	Limit	0.004	1424.5	5.698	0.011396	or or reserve, see here were transferent seen to consider	FALSE
118431397			C. COMMON A STREET AND ADDRESS OF THE CO.	sell	Limit	0.007	1436.5	10.0555	0.020111	a non-constant and the second	
118431395	White his war and a manager and	and the second	The contract the Contract of the con-	sell	Limit	0.03	1444.8	43.344	0.086688	er en	FALSE
118431294	- 6			sell	Limit	0.007	1450	10.15	0.01015	and the second control of the second control of the second	FALSE
118428213	M		commence and a commence of the	sell	Market	0.011	1447.2	15.9192	0.0318384		FALSE
118428211	P. S. A. Strategy Company of the Com	a command and	CONTRACTOR OF STORMS CO. COMP. AND CO. C. C. C.	sell	Market	0.007	1448.5	10.1395	0.020279		FALSE
118428209			consequent and consequences such discours and consequences.	sell	Market	0.014	1469.4	20.5716	manner i de la companie de la compa	bullioners and the second seco	FALSE
118428207	11/11/2022,	4:15 E	TH/USD	sell	Market	0.007	1471.6	10.3012	0.0411432 0.0206024	CONTRACTOR	FALSE FALSE

Exhibit C - Withdrawals

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	Time	Coin	Amount	Destination	Status	Transaction (D	
1509510	2022-11-11T21:50:33.809931+00:00	USDP	38	0x9408c666a65F2867A3ef3060766077462f84C717		The state of the s	fee
1509259	2022-11-11T21:41:03.354221+00:00	USDP	2600	0.0400.000	,	0x605fc897ee9fcc9706dbb490bcf2a380952e71c4f09e62ed781971a8434da890	0.5
				0.0400 000 0000		0xaa518f383b92368966bf14640c2e33f8ac7c0489550fd73466d1498256950846	0.5
1508839	2022-11-11T21:26:40.858354+00:00	USDP	2103 762182	0.040408066965E386243960070607746284C717	complete	0xd754d2c4671d3458d72a52d8ed47ee2b3f72c6d74daebcb04d00881d059ef07c	0.5
1508639	2022-11-11T21:19:39.172376+00:00	USDP	56 817637	1.0v04080ccc-ce=2882740-600076007746284C717	complete	0xd754d2c4671d3458d72a52d8ed47ee2b3f72c6d74daebcb04d00881d059ef07c 0x3c05248fe84ef78d2a9b6d569a761afdae7645dad792be77699eaa3168d192da	0.5
	2022-11-11T21:17:26.121148+00:00			300 TOOOGOGGGGGGGGGGGGGGGGGGGGGGGGGGGGGGG	complete	0x19f0c8088e45ha7da4cef84c7e5cehf14ef882n88e14Ee3eE8e82a-E-2c54e	0.5
	time and the second of the sec	JOD!	30.017037	0x8e870d67f660d95d5be530380d0ec0bd388289e1	cancelled	THE RESIDENCE OF THE PROPERTY	0.5

9589 0710 5270 2246 1775 98

CERTIFIED MAIL



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